

Allowable Costs for Breastfeeding Peer Counseling Programs

Breastfeeding peer counseling (BFPC) funds that the Food and Nutrition Services (FNS) distributes to State agencies are to be used to develop or expand activities necessary to sustain a peer counseling program based on the FNS [WIC Breastfeeding Model for Peer Counseling](#). The primary purpose of the funds is to provide direct peer counselor to WIC mother breastfeeding support services. A State agency's peer counseling implementation plan and annual line item budget addendum to its State Plan must demonstrate an appropriate balance between direct service delivery by peer counselors, and other staff that manage or provide expertise to peer counselors and the purchase and use of equipment and materials. The use of BFPC funds for expenditures that are not supported by the WIC Breastfeeding Model for Peer Counseling are not authorized.

The table below helps to identify allowable BFPC costs.*

NSA = Nutrition Services and Administration

IBCLC = International Board Certified Lactation Consultant

Item or Service	Allowable Costs	Comments
Durable Goods and Space		
Furniture, computers/laptops, and office equipment used to provide peer counseling services and training	Yes	
Phone lines, internet service, cell/smartphones, pagers and answering machines for contacts between peer counselors and mothers	Yes	
Portable baby scales to weigh infants outside of the WIC clinic	No	NSA funds may be used to purchase scales for clinical assessment for use by staff other than peer counselors.
Space and lease costs for peer counselors to provide services	Yes	
Incentives and Educational Materials to Promote Breastfeeding		

Item or Service	Allowable Costs	Comments
Breastfeeding educational materials for mothers such as pamphlets and DVDs	No	NSA funds may be used for this purpose.
Breast pumps and breastfeeding aids for mothers	No	NSA funds may be used for this purpose.
Breast pumps and breastfeeding aids for <i>demonstration</i> purposes by peer counseling staff	Yes	
Incentive items distributed to WIC participants to encourage breastfeeding	No	NSA funds may be used for this purpose.
Personnel and Compensation		
Salaries and compensation for peer counseling staff: peer counselors, designated peer counselor coordinators, and Designated Breastfeeding Experts (DBE)	<p>Yes. BFPC funds may be used to hire staff to provide oversight/management of peer counseling programs and/or supervision, mentoring and referral expertise for peer counselors.</p> <p>BFPC funds may also be used to pay for DBE time if a peer counselor refers a WIC mother to a DBE for consultation outside of the peer counselor's scope of practice. The DBE may be compensated using BFPC funds if the mother continues to be supported by the peer counselor and remains part of the peer counselor's caseload.</p>	<p>BFPC funds cannot be used to disproportionately hire lactation management experts versus peer counselors.</p> <p>NSA funds must be used for consultations for WIC mothers who are not referred by peer counselors and are not part of a peer counselor's caseload.</p> <p>Refer to the Nutrition Services Standards for DBE qualifications, roles and responsibilities.</p>

Item or Service	Allowable Costs	Comments
Salaries and compensation for dual-role staff, e.g., part-time WIC Nutrition Assistant and part-time peer counselor	Yes. BFPC funds may be used for the portion of time spent as peer counselor. The “dual-role” staff must meet the definition of peer counselor in the WIC Breastfeeding Model for Peer Counseling , including being available to participants outside of regular WIC hours. See FNS Breastfeeding Policy and Guidance document for additional information on dual-role staff. State agency policies must be approved by FNS Regional Offices.	Definition of Peer Counselor: <ul style="list-style-type: none"> • Paraprofessional (see WIC Breastfeeding Model for Peer Counseling for definition) • Recruited and hired from target population and, to the extent possible, representing the same racial/ethnic background as the mothers they support • Available to WIC participants outside usual clinic hours and outside the WIC clinic environment, and • Previous experience with breastfeeding, having breastfed at least one baby
Males as breastfeeding peer counselors	No. The definition of peer counselor in the WIC Breastfeeding Model for Peer Counseling is based on research demonstrating the benefit of hiring peer counselors from WIC’s target population of WIC-eligible women.	Men can be valuable members of breastfeeding promotion and support activities in WIC, such as providing father-to-father support groups. However, these activities are outside of those defined by the WIC Breastfeeding Model for Peer Counseling and must be funded through the regular NSA grant or other sources. See FNS Peer Counseling Management Curriculum for additional information.
Recruitment of peer counselors and related staff	Yes	

Item or Service	Allowable Costs	Comments
Staffing and expenses related to breastfeeding hotlines and call centers.	Yes. BFPC funds may be used to hire peer counselors to answer calls to a WIC breastfeeding hotline if the peer counselor meets the definition of peer counselor and receives the appropriate training and supervision as outlined in the WIC Breastfeeding Model for Peer Counseling . Other expenses related to the hotline/call center such as rent, phone lines, equipment, are allowable for any portion of those expenses that are for the purpose of a WIC peer counselor providing WIC participant contacts through the hotline/call center. WIC Peer Counselors may not provide services to non-WIC participants.	
Staff Training and Resources		
Travel for training of peer counselors and peer counseling staff/managers	Yes	
Travel for home and hospital visits by peer counseling staff	Yes, for visits to WIC participants; peer counselors may not provide services to non-WIC participants.	
Continuing education for DBE's	Yes, if it relates to servicing peer counseling programs (e.g., mentoring, serving as a referral)	

Item or Service	Allowable Costs	Comments
Breastfeeding resources for peer counseling staff	Yes, if the resources are related to peer counseling, e.g., training materials for peer counselors.	
Breastfeeding resources for WIC staff not related to peer counseling	No	NSA funds may be used to purchase general breastfeeding resources for WIC staff.
Training and coursework for peer counselors to become IBCLCs or Certified Lactation Counselors (CLCs)	No. NSA funds may be used for CLC or IBCLC training and coursework.	The priority use of BFPC funds is to hire and train peer counselors to provide breastfeeding peer counseling services to WIC participants. The research recommends that peer counselors be provided career path training options.
CLC or IBCLC exam, renewal or membership fees	No	At the WIC State agency's discretion, NSA funds may be used for CLC or IBCLC training, exam fees, renewal and/or association membership fees. The State agency must determine if it is necessary and of benefit to the WIC Program for the person in a particular job position to have the certification. SAs must also determine whether or not the cost fits within its WIC NSA grant budget.
Peer Counseling Program Advertising and Promotion		
Pamphlets and similar materials to promote the peer counseling program	Yes	

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Media campaigns, e.g., bus placards, to advertise BFPC programs	Yes	FNS would not expect to see a disproportionate amount of the BFPC funds spent on advertising the program at the expense of direct services to participants. BFPC funds may not be used for ads that promote breastfeeding in general—NSA funds may be used for those purposes.
T-Shirts, buttons and similar low-cost items that identify peer counselors	Yes	
Miscellaneous		
Indirect program costs (e.g., lease/rental costs, copying costs, HR services, legal services, utilities)	Yes, but only those that are related to providing a peer counseling program.	
Second nutrition education contacts	No. BFPC funds are for activities that are in addition to current required WIC activities.	NSA funds provide for at least two nutrition education contacts; therefore, BFPC funds may not be used for the “second” contact. In addition, the 1/6 th nutrition education requirement and breastfeeding target must be met with regular NSA funds.
Childcare	No	
Cribs or other materials and equipment for infants of peer counselors who bring their babies to work	No	
Monitoring and tracking of program effectiveness.	Yes. Funds may be used to monitor and track program components (e.g., contacts, referrals, training) to determine effectiveness and where	

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	improvements are needed. However, evaluation studies may not be paid for using BFPC funds.	
Peer counseling services to non-WIC participants	No. Peer counselors should refer WIC-eligible women to WIC to apply for WIC benefits. Peer counselors should refer women who are not WIC-eligible to appropriate non-WIC resources. .	.
Breastfeeding coalitions	No	BFPC funds can only be used for services and activities related directly to peer counseling.

* Updated 11/29/2018. This is not an exhaustive list of allowable costs. Refer to the FNS Regional Office for questions about allowable cost, and to the Breastfeeding Policy and Guidance.